

# Exhibit C

**Bayzle, Scott E.**

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**From:** Pappas, William G.  
**Sent:** Tuesday, May 06, 2014 4:35 PM  
**To:** 'Bryan Barnhart'  
**Cc:** Miller, Axline & Sawyer; Bayzle, Scott E.  
**Subject:** RE: Hamner Protective Order

Bryan, I am writing to respond to your request that The Hamner Institutes (the "Hamner") consent to a complete dissolution of the *Stipulation and Protective Order Relating to Documents and Deposition Testimony Produced by the Hamner Institutes for Health Sciences* (the "Protective Order"). After due consideration, the Hamner cannot consent to a dissolution of the Protective Order. The Hamner entered into the Protective Order, including specifically the Order's terms and procedures for handling confidential information, to protect the confidential information and documentation that was produced in response to plaintiff's 2010 and 2012 subpoenas and by Dr. Dodd in his deposition. Without the Protective Order, the Hamner would lose important protections regarding its confidential information. Sincerely, Bill Pappas

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**William Pappas**

Partner  
919.890.4164

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**From:** Bryan Barnhart [mailto:bbarnhart@toxictorts.org]  
**Sent:** Thursday, May 01, 2014 3:34 PM  
**To:** Bayzle, Scott E.  
**Cc:** Pappas, William G.; Miller, Axline & Sawyer  
**Subject:** RE: Hamner Protective Order

Good afternoon.

Thank you for speaking with me this afternoon.

I understand that you will need to speak with your client about dissolving the protective order.

I look forward to hearing back from you or Bill early next week. As I noted on the phone, it will save the Court and the parties time and effort if we can get an answer (or at least a status report) by close of business on May 6<sup>th</sup>.

Thank you again for your courtesy today.

Bryan

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**From:** Bayzle, Scott E. [mailto:scottbayzle@parkerpoe.com]  
**Sent:** Wednesday, April 30, 2014 1:13 PM  
**To:** Pappas, William G.; 'Bryan Barnhart'  
**Cc:** Miller, Axline & Sawyer  
**Subject:** RE: Hamner Protective Order

Hi Bryan,

I represent The Hamner Institutes along with Bill Pappas. I have reviewed your recent correspondence (emails to Bill dated April 22 and 29) and had the opportunity to review the background for the September 29, 2010 protective order you reference. I do have a few questions concerning the current status of the MDL litigation and your request to dissolve the protective order in place (which protects The Hamner's and Dr. Dodd's 2010 and 2012 document productions pursuant to the subpoenas) that I would like to discuss with you.

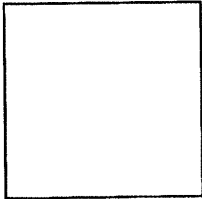
I am available tomorrow afternoon (anytime between noon and 5:00 p.m. EST) and Friday (8:00 a.m. – 5:30 pm. EST) for a call. Please let me know if you have any availability during those times.

Many thanks and I look forward to speaking with you,

Scott Bayzle

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**Scott Bayzle**  
Partner



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Phone: 919.835.4627 | Fax: 919.834.4564 | [www.parkerpoe.com](http://www.parkerpoe.com) | [vcard](#) | [map](#)

**From:** Pappas, William G.  
**Sent:** Wednesday, April 23, 2014 4:03 PM  
**To:** 'Bryan Barnhart'  
**Cc:** Miller, Axline & Sawyer; Bayzle, Scott E.  
**Subject:** Hamner Protective Order

Bryan, we've received your letter request. The key management contacts at The Hamner Institutes are unavailable because of travel/work issues this week and we need to confer with them regarding your request. Consequently, we will not be able to respond by Friday but will be back in touch with you as soon as we can. Regards, Bill

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**William Pappas**  
Partner  
919.890.4164

**From:** Bryan Barnhart [<mailto:bbarnhart@toxictorts.org>]  
**Sent:** Tuesday, April 22, 2014 5:55 PM  
**To:** Pappas, William G.  
**Cc:** Miller, Axline & Sawyer  
**Subject:** Hamner Protective Order

Good afternoon.

Please see attached correspondence.

Thank you.

Bryan

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